

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

HADIS NUHANOVIC,

Defendant.

No. CR20-151RAJ

DEFENDANT HADIS  
NUHANOVIC'S SENTENCING  
MEMORANDUM

Defendant Hadis Nuhanovic ("Mr. Nuhanovic") respectfully submits this  
Sentencing Memorandum to assist the Court in calculating the applicable Advisory  
Guidelines sentencing range and determining a reasonable sentence pursuant to 18  
U.S.C. § 3553(a).

DEFENDANT HADIS NUHANOVIC'S SENTENCING MEMORANDUM- 1  
*United States v. Nuhanovic, et al.*, No. CR20-151RAJ

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## INTRODUCTION

Mr. Nuhanovic comes before the Court with no prior convictions. He has been happily married since 2011, and he and his wife care for their two-year-old son in a quiet suburb near Atlanta, Georgia. (PSR ¶ 81, 84). In 2011, Mr. Nuhanovic began working in e-commerce, eventually developing his work into a successful 3P seller business. (PSR ¶ 83). He created this life through hard work and devotion to his family, despite being the victim of a war that turned him into a refugee at an early age.

As the Superseding Information details, Mr. Nuhanovic took a number of unlawful shortcuts to advance his e-commerce business, and he stands before the Court ready to take responsibility for his actions. The Government asks that the Court adopt the PSR's finding that the total offense level is 17 with a Guidelines range of 24 to 30 months. The defense contends that the total offense level should be 15 (after the two counts in the Superseding Information are placed into the same group under § 3D1.2) with a Guidelines range of 18 to 24 months. Under either finding, based on Mr. Nuhanovic's history and his culpability in relation to other co-defendants, the defense respectfully requests that the Court sentence Mr. Nuhanovic to one year and a day in custody followed by a period of supervised release.

## OBJECTIONS TO THE PSR

The defense objects to the probation office's grouping of the conspiracy to violate the Travel Act count (Count 1) and the tax evasion count (Count 2). Specifically, the PSR places the two counts into separate groups (both of which have total offense levels of 18) and then adds 2 levels under § 3D1.4. The defense maintains that these two counts should fall into the same group under § 3D1.2, which provides that "[a]ll counts involving substantially the same harm shall be grouped together into a single Group." Subsection (c) states that counts "involve substantially the same harm... [w]hen one of the counts embodies conduct that is treated as a specific offense characteristic in, or other adjustment to, the guideline applicable to another of the counts."

In *United States v. Haltom*, 113 F.3d 43 (5th Cir. 1997), the defendant profited from a false invoice scheme and then failed to report the illegally obtained income for four years. He entered a guilty plea to one count of mail fraud (with a total offense level of 20) and four counts of tax evasion (with a total offense level of 16). The district court refused to place the mail fraud count and the tax evasion counts into the same group, resulting in an additional two levels under § 3D1.4. The Fifth Circuit vacated the sentence, noting that "[t]he stated purpose of the grouping rules is to

1 ensure that a defendant convicted of multiple offenses receives ‘incremental  
2 punishment for significant additional criminal conduct.’” *Id.* at 45. The Court found:  
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4 “Haltom’s offense level for tax evasion was increased by 2 because his unreported  
5 income was derived from criminal activity, *i.e.*, the mail fraud alleged in count one.  
6  
7 It is therefore indisputable that the mail fraud count ‘embodies conduct that is treated  
8 as a specific offense characteristic’ of the tax evasion counts.” *Id.*, at 46.

9  
10 As in *Haltom*, the conspiracy to violate the Travel Act count embodies  
11 conduct that is treated as a specific offense characteristic of the tax evasion count.  
12 Specifically, the offense level for tax evasion was increased by 2 because Mr.  
13 Nuhanovic’s unreported income was derived from criminal activity (*i.e.*, the Travel  
14 Act conspiracy in count one). For this reason, there should be no incremental  
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16 punishment under § 3D1.4.

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18 While Counsel is not aware of a Ninth Circuit case touching directly on this  
19 issue, Counsel notes that other circuits have rejected or questioned the Fifth Circuit’s  
20 rationale in *Haltom*. See, *United States v. Doxie*, 813 F.3d 1340 (11th Cir. 2016);  
21 *United States v. Vucko*, 473 F.3d 773 (7th Cir. 2007); *United States v. Peterson*, 312  
22 F.3d 1300 (10th Cir. 2002); *United States v. Vitale*, 159 F.3d 810 (3rd Cir. 1998);  
23  
24 *Weinberger v. United States*, 268 F.3d 346 (6th Cir. 2001). Counsel also notes that  
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26

1 in *United States v. Smith*, 424 F.3d 992, 1015 (9th Cir. 2005), the Ninth Circuit  
 2 affirmed the district court's decision to group tax counts separately from money  
 3 laundering and mail and wire fraud counts. The Court in *Smith*, however, only  
 4 reviewed subsections (a) and (b) of § 3D1.2, which concern whether the counts  
 5 involved the same harm and victim. Here, the defense argues under subsection (c)  
 6 of § 3D1.2.  
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8  
 9 As the plain language of § 3D1.2(c) strongly suggests that the two counts in  
 10 the instant case should be placed into the same group, there should be no incremental  
 11 punishment. The total offense level for Mr. Nuhanovic should therefore be 15 with  
 12 a Guidelines range of 18 to 24 months.  
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#### 15 **SENTENCING FACTORS UNDER 18 U.S.C. § 3553(a)**

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 17 As the Court is well aware, the Guidelines are advisory, and the Court must  
 18 ultimately impose a sentence that is "sufficient, but not greater than necessary" after  
 19 considering the sentencing factors under 18 U.S.C. § 3553(a).  
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21 Among the factors under § 3553(a), the Court is required to consider: 1) the  
 22 nature and circumstances of the offense; 2) the history and characteristics of the  
 23 defendant; 3) the need for the sentence imposed to afford adequate deterrence to  
 24 criminal conduct, and 4) the need to avoid unwarranted sentence disparities among  
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1 defendants with similar records who have been found guilty of similar conduct.

2 I. Nature and Circumstances of the Offense

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4 Mr. Nuhanovic committed illegal acts, including paying Amazon employees  
5 in exchange for information, helping Client-1 with reinstatement of a suspended  
6 account, and playing a role in causing the suspension of Client-1's competitor. (PSR  
7 ¶ 31-32, 35-37). Mr. Nuhanovic takes full responsibility for his actions and the harm  
8 he caused. It is important, however, to compare Mr. Nuhanovic's role in the charged  
9 conspiracy with the other co-defendants.  
10

11 A. Mr. Nuhanovic's role in the conspiracy

12  
13 The Superseding Information lists co-defendants Ephraim Rosenberg and  
14 Joseph Nilsen before Mr. Nuhanovic. (Doc. 146, p. 9-10). There is a good reason for  
15 this. Rosenberg and Nilsen both operated consulting businesses aimed at 3P sellers.  
16 They were savvy consultants, and both men had significant contacts inside Amazon  
17 that they used in order to help their clients. Rosenberg "*hosted an annual 3P seller*  
18 *conference in Brooklyn*" and "*hosted interactive 3P consulting webinars.*" *Id.* at 9.  
19 Nilsen founded the consulting company Digital Checkmate, Inc. and offered 3P  
20 sellers a host of consulting services. *Id.* at 9-10. Similarly, Leccese, the vice  
21 president of Digital Checkmate, Inc., worked for Nilsen and was intimately involved  
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1 in his consulting business. *Id.* at 9-10. Mr. Nuhanovic, on the other hand, was  
2 primarily a 3P seller and focused on growing his 3P seller business.  
3

4 On the other side of the coin are co-defendants Nishad Kunju and Rohit  
5 Kadimisetty. In its previously filed sentencing memorandum, the Government  
6 explained that Nilsen contacted Kadimisetty, a former Amazon employee, in 2017  
7 and that Kadimisetty “*then played a key role in starting the conspiracy.*” (Doc. 110,  
8 p. 11). The Government explained that Kadimisetty “*helped to corrupt Amazon*  
9 *employees in India and connect them with his co-conspirators across the United*  
10 *States.*” *Id.* at 10-12. Kadimisetty corrupted multiple Amazon employees,  
11 coordinated bribes and the theft of information from Amazon, and took orders from  
12 consultants. *Id.* at 12. Kunju, a trusted Amazon employee, took many of the bribes  
13 and, as discussed below, completed many of the requested tasks.  
14

15 The Superseding Information spans 33 pages and 40 paragraphs. (Doc. 146).  
16 Paragraphs 28 through 37 detail the “*Overt Acts*” of the charged conspiracy. *Id.* at  
17 19. Notably, Mr. Nuhanovic is only mentioned in three (3) of the ten paragraphs.  
18 Nilsen, however, is featured in each of the ten (10) paragraphs and Kunju is named  
19 in nine (9) of the paragraphs. Paragraph 28, which contains 12 subparts and details  
20 a series of bad acts, names Nilsen, Rosenberg, and Leccese, but it does not mention  
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1 Mr. Nuhanovic. (Doc. 143, p. 18-21). Paragraph 29 falls under a section titled  
2 “*Examples of Misappropriation of Internal Files and Information.*” *Id.* at 146. While  
3  
4 Nilsen, Rosenberg, Leccese, and Kunju are mentioned, Mr. Nuhanovic is not.

5       In Paragraph 30, under a section titled “*Examples of Reinstatement,*” Mr.  
6 Nuhanovic is mentioned. *Id.* at 22-23. This paragraph explains that in June of 2018,  
7 Mr. Nuhanovic used an Amazon employee to help reinstate Client-1’s seller account.  
8 It is important to note that Client-1’s business partner was a personal friend to Mr.  
9 Nuhanovic, and it was in that capacity that Mr. Nuhanovic agreed to help Client-1.  
10 It is also important to note that Mr. Nuhanovic did not have the ability or contacts  
11 inside Amazon to reinstate Client-1’s account. Instead, Nilsen and Leccese were  
12 enlisted to help Client-1. Indeed, the paragraph notes that Nilsen and Leccese, with  
13 the help of Kunju, prepared a plan of action containing false representations for  
14 Client-1 to submit to Amazon in order gain reinstatement. *Id.* at 23.  
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20       Paragraph 31 explains that Client-1’s account was again suspended in  
21 December of 2018. *Id.* at 23. Once again, Mr. Nuhanovic enlisted the help of Nilsen  
22 to assist his friend’s business. Nilsen, with the help of Kunju, prepared a plan of  
23 action and conducted a conference call with members of Amazon’s seller support  
24 team. When Nilsen’s efforts failed, Nilsen enlisted Rosenberg. As the Information  
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1 details, Rosenberg contacted Amazon employees and created a video before the  
2 account was eventually reinstated.  
3

4 Paragraph 32 discusses the reinstatement of a seller account owned by Client-  
5 2, but Mr. Nuhanovic's name does not appear in this paragraph. Paragraph 33  
6 discusses reinstatement of an account owned by Client-3, but Mr. Nuhanovic's name  
7 does not appear in this paragraph. Paragraph 34 discusses reinstatement of a product  
8 listing owned by Client-4. Again, Mr. Nuhanovic's name does not appear in this  
9 paragraph.  
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12 Paragraph 35 does mention Mr. Nuhanovic. This paragraph explains that  
13 Client-1, in June of 2018, requested that a seller account belonging to Victim-1 be  
14 attacked. Similar to paragraph 30, it was not Mr. Nuhanovic's abilities and  
15 connections that were used to suspend Victim-1's account. Rather, it was Nilsen who  
16 registered a domain name, pretended to be a member of a law group, and submitted  
17 a fabricated complaint to Amazon in order to cause the suspension of Victim-1's  
18 account. Paragraphs 36 and 37 detail two more victims (Victim-2 and Victim-3) but  
19 nowhere does Mr. Nuhanovic's name appear in these paragraphs.<sup>1</sup>  
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25 <sup>1</sup> Notably, Paragraph 36 explains that it was Nilsen who uploaded a "flat file" to  
26 Amazon's computer network which resulted in Victim-2's product listing to show  
27 a lewd image.

1 A close reading of the Superseding Information also shows that it is replete  
2 with bad acts committed by “*Defendant’s Co-Defendants*” but not by Mr. Nuhanovic  
3 personally. *See*, Paragraph 3 (adulterating victims’ product listings with lewd or  
4 offensive images); Paragraph 26(p) (eliminating limits of 3P seller account’s ability  
5 to store hazmat inventory); Paragraph 26(q) (erasing shipping tracking information  
6 which caused Amazon to reimburse sellers for inventory); Paragraph 29(b)  
7 (misappropriating data for Consultant-1); Paragraph 32 (helping Client-2 reinstate  
8 his account); Paragraph 33 (helping Client-3 reinstate his account); Paragraph 34  
9 (helping Client-4 reinstate his account). *See also*, Paragraphs 26(h), (m)(i).

14 In a message sent by Nilsen on January 11, 2019 concerning the reinstatement  
15 of Client 1’s account, Nilsen explained how he viewed the hierarchy within the  
16 conspiracy: “...does [Client-1] know how lucky he is that his Asian partner got in  
17 touch with some guy in atl who got in touch with some guy in ny who got in touch  
18 with some Orthodox Jew out of Brooklyn who got in touch with somebody high up  
19 and paid them off to save his account.”

22 To be clear, Mr. Nuhanovic (the “*guy in atl*”) was a member of the conspiracy  
23 and committed unlawful acts, but his influence was limited when compared to  
24 others. He did not possess the ability to carry out the reinstatements and suspensions,  
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26

1 and he was not in a position of trust at Amazon to complete the requested tasks. He  
2 also did not personally engage in a number of the bad acts cited in the Superseding  
3 Information. And unlike Rosenberg and Kunju, he has taken responsibility for his  
4 wrongful conduct by entering a plea of guilty.  
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6  
7 B. The tax count.

8 Mr. Nuhanovic failed to pay the full amount of the taxes he owed to the IRS.  
9 He has taken full responsibility for this failure, and he intends to pay the \$160,453.00  
10 owed to the IRS into the registry of the court before the sentencing hearing on  
11 February 10, 2023. Mr. Nuhanovic has also requested that he be able to immediately  
12 pay all penalties associated with the outstanding taxes, but the defense has been  
13 informed that the IRS will calculate such penalties at a later date. When he is  
14 informed of any penalty, Mr. Nuhanovic intends to immediately pay the IRS to  
15 satisfy this obligation.  
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19 II. History and Characteristics of the Defendant  
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21 It is undisputed that Mr. Nuhanovic has no criminal history and has fully  
22 complied with all conditions of his release. (PSR ¶ 6). He is a devoted husband and  
23 caring father to his two-year old son. He also helps to care for his parents who speak  
24 little English. (PSR ¶ 82-84). He is the sole provider for his family, and he is well  
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26

1 aware that his absence may significantly impact his family's financial stability. His  
 2 primary fears are being away from his wife for a significant period of time and the  
 3 impact that his absence will have on his young son's development and emotional  
 4 state. (PSR ¶ 83-84).



(Mr. Nuhanovic with his wife and son.)

19 Mr. Nuhanovic's devotion to his family and the drive to create a comfortable  
 20 life for them has its roots in a much darker time. In 1994, Mr. Nuhanovic's family  
 21 fled Bosnia and Herzegovina as the result of war and ethnic cleansing.<sup>2</sup> His family  
 22

24  
 25 <sup>2</sup> It is estimated that more than 2 million people were displaced as a result of the  
 26 war. *See*, [https://en.wikipedia.org/wiki/Ethnic\\_cleansing\\_in\\_the\\_Bosnian\\_War](https://en.wikipedia.org/wiki/Ethnic_cleansing_in_the_Bosnian_War)  
 27 (last accessed January 31, 2023).

1 was targeted due to their religious affiliation, and his father still carries a bullet  
 2 embedded in his body from the conflict. To escape the violence and a certain death  
 3 sentence, Mr. Nuhanovic's family gathered what few possessions they could carry  
 4 and then walked 50 kilometers to a border town near Croatia. When life again  
 5 became too dangerous, his family walked an additional 20 kilometers to a refugee  
 6 camp in Croatia.  
 7  
 8

9 For two years, Mr. Nuhanovic lived with his family in makeshift homes  
 10 (which often consisted of little more than a tent). Food was scarce. Rats were  
 11 plentiful. Winters were cold. Violence and sickness were commonplace. His family  
 12 had been stripped of their homes, possessions, and dignity, and they were at all  
 13 times at the mercy of strangers for survival.<sup>3</sup> One news article described the camp  
 14 as having "*horrific*" conditions and explained that "*refugees lived in makeshift*  
 15 *tents on a 3-mile stretch of road, without running water, electricity or gas.*"<sup>4</sup>  
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23 <sup>3</sup> An AP news video from 1995 shows the living conditions of the camp in Croatia.  
 24 See, <https://www.youtube.com/watch?v=m6qeirBqPEc> (last accessed January 31,  
 25 2023).

26 <sup>4</sup> See, <https://apnews.com/article/919f39f708ae1e502c6849f9db92d7d2> (last  
 27 accessed January 31, 2023).



*(Mr. Nuhanovic (middle) and his family in the refugee camp shortly before immigrating to the United States.)*

Fortunately, this country extended Mr. Nuhanovic's family a second chance at life, and his family immigrated to the United States in 1996. While they no longer feared for their lives, new challenges arose, including fitting into a society skeptical of their religion and trying to find work. Mr. Nuhanovic remembers his family wondering how they were going to make a living and having to root through dumpsters for furniture. His family eventually moved to Iowa where his mother and father worked grueling hours in a meat packing plant for nearly two decades. Through hard work, his parents were able to provide a stable life for Mr. Nuhanovic, and he was able to focus on school, marriage, and creating a business of his own to ensure that his family would have a decent life.



1 Mr. Nuhanovic's wife has provided a character letter which is attached to  
2 this memorandum. (See, Exhibit 1). She explains that she met Mr. Nuhanovic  
3 when they were teenagers and that they have now been together for 14 years. She  
4 explains that they had similar backgrounds and challenging childhoods. She  
5 describes her husband as being "*a good man with a good heart.*" She explains that  
6 the current case has had a deep impact on their emotional states. Her largest  
7 concern is having to explain to their son where Mr. Nuhanovic has gone, and she  
8 asks that the Court "*take into consideration how loved and needed [her] husband*  
9 *is*" by his family.  
10

11 Mr. Nuhanovic's brother, Haris Nuhanovic, has also provided a letter in  
12 support. (See, Exhibit 2). He explains that he and his brother grew up alone much  
13 of the time because their parents had to work to support them: "*Coming from the*  
14 *poorest country in Europe and escaping terrible ethnic cleansing due to being*  
15 *Muslim, my parents thought they needed to come to America and work, work, work*  
16 *to get us a home, a car and food on the table.*" He explains that his brother helped  
17 raise him and that Mr. Nuhanovic took on many adult responsibilities at an early  
18 age. He states that Mr. Nuhanovic "*is the glue to our family*" and "*puts everyone*  
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1 *first and himself last.”* His brother also notes that Mr. Nuhanovic has “*taken full*  
 2 *accountability*” and that “*I can see his regret and suffering.*”  
 3

4 It would be easy to say that Mr. Nuhanovic committed the illegal acts in the  
 5 Superseding Information based purely out of greed. But that would be an  
 6  
 7 oversimplification of his root desire to provide for his family. He now recognizes  
 8 the harm that he caused, and he is remorseful for his actions. His primary goal  
 9  
 10 moving forward is to provide for his family in a lawful and ethical way and to be a  
 11 productive member of society.

12 III. The Need for the Sentence Imposed to Afford Adequate  
 13  
 14 Deterrence to Criminal Conduct

15 This case has been a stark wake-up call for Mr. Nuhanovic. Mr. Nuhanovic’s  
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 17 home was searched by law enforcement in August of 2020, and in the 30 months  
 18 that have elapsed since the search, Mr. Nuhanovic has been a model citizen. The  
 19  
 20 search of his home was a traumatizing experience to both him and his wife, and  
 21 that instance alone has been enough to set him on the right course. As a young  
 22  
 23 father with no prior criminal history, any sentence handed down by the Court will  
 24 be enough to deter Mr. Nuhanovic from committing future criminal conduct.  
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1 This case has also already served as a warning to 3P sellers who would  
 2 engage in illegal conduct. The indictment in the above-styled case made headlines  
 3 across the country and sent shockwaves through the 3P seller community. The  
 4 Government made its point that stealing information from Amazon will not be  
 5 tolerated, and the threat of a federal indictment is likely enough to deter most from  
 6 committing such conduct in the future.

#### 9 IV. The Need to Avoid Unwarranted Sentence Disparities

10 A significant downward variance from the Guidelines in this case is necessary  
 11 to avoid unwarranted sentence disparities. The U.S. Sentencing Commission's  
 12 Judiciary Sentencing Information (JSIN) provides statistics on sentencing between  
 13 2017 and 2021 based on the type of offense and the offense level.<sup>5</sup> Under § 2B4.1,  
 14 defendants with a final offense level of 17 *who were sentenced to prison* received an  
 15 average sentence of 15 months and a median sentence of 15 months.<sup>6</sup> For all  
 16 offenders (probation and prison), the average sentence was 12 months and the  
 17 median sentence was 12 months. In the vast majority of cases, defendants received  
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24 <sup>5</sup> There is an insufficient number of defendants sentenced under § 2DE1.2.

25 <sup>6</sup> See, <https://jsin.ussc.gov/analytics/saw.dll?Dashboard> (last accessed January 30,  
 26 2023).

1 a downward variance or departure (46%) or credit for substantial assistance (39%).  
 2 Only 14% of defendants received a sentence within the Guidelines range. Moreover,  
 3 after excluding defendants who received a § 5K1.1 departure, 26% of defendants  
 4 received probated sentences.<sup>7</sup>  
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6  
 7 It should also be noted that the loss amount in the instant case is far less than  
 8 in most cases which employ § 2B4.1. According to the Sentencing Commission's  
 9 2021 Source Book of Federal Sentencing Statistics, the average loss amount for  
 10 offenders sentenced under § 2B4.1 was more than \$10,000,000 and the median loss  
 11 amount was nearly \$400,000.<sup>8</sup> Here, the loss amount is significantly lower.  
 12

13  
 14 In the Western District of Washington, there do not appear to be any  
 15 reported cases sentenced under § 2B4.1 in recent years.<sup>9</sup> For fraud and theft cases,  
 16 however, the statistics show that the average sentence in this district in 2021 was  
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19 \_\_\_\_\_  
 20 <sup>7</sup> The average sentence for all defendants with a total offense level of 15 is 14  
 21 months but the percentage sentenced to probation drops to 10%.

22 <sup>8</sup> See, [https://www.ussc.gov/sites/default/files/pdf/research-and-](https://www.ussc.gov/sites/default/files/pdf/research-and-publications/annual-reports-and-sourcebooks/2021/2021_Annual_Report_and_Sourcebook.pdf)  
 23 [publications/annual-reports-and-](https://www.ussc.gov/sites/default/files/pdf/research-and-publications/annual-reports-and-sourcebooks/2021/2021_Annual_Report_and_Sourcebook.pdf)  
 24 [sourcebooks/2021/2021\\_Annual\\_Report\\_and\\_Sourcebook.pdf](https://www.ussc.gov/sites/default/files/pdf/research-and-publications/annual-reports-and-sourcebooks/2021/2021_Annual_Report_and_Sourcebook.pdf) (Table E-6) (last  
 accessed January 30, 2023).

25 <sup>9</sup> See, <https://ida.ussc.gov/analytics/saw.dll?Dashboard> (last accessed January 30,  
 26 2023).

1 16 months while the national average was 20 months.<sup>10</sup> Consistency in sentencing  
 2 in the Western District of Washington would suggest that a sentence lower than the  
 3 national average is proper. A sentence of 12 months and one day would therefore  
 4 not create an unwarranted sentencing disparity, especially when taking into  
 5 account Mr. Nuhanovic's unique history, role in the offense, earnest remorse, and  
 6 quick repayment to the IRS.<sup>11</sup>  
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21 <sup>10</sup> See, [https://www.ussc.gov/sites/default/files/pdf/research-and-](https://www.ussc.gov/sites/default/files/pdf/research-and-publications/federal-sentencing-statistics/state-district-circuit/2021/waw21.pdf)  
 22 [publications/federal-sentencing-statistics/state-district-circuit/2021/waw21.pdf](https://www.ussc.gov/sites/default/files/pdf/research-and-publications/federal-sentencing-statistics/state-district-circuit/2021/waw21.pdf)  
 23 (Table 7) (last accessed January 30, 2023).

24 <sup>11</sup> In one recent case in the Central District of California, a defendant was  
 25 sentenced to 18 months for stealing \$1.3 million from Amazon through a  
 26 fraudulent refund scheme. See, [https://www.justice.gov/usao-cdca/pr/hacienda-](https://www.justice.gov/usao-cdca/pr/hacienda-heights-man-sentenced-18-months-federal-prison-stealing-13-million-amazon)  
 27 [heights-man-sentenced-18-months-federal-prison-stealing-13-million-amazon](https://www.justice.gov/usao-cdca/pr/hacienda-heights-man-sentenced-18-months-federal-prison-stealing-13-million-amazon) (last  
 28 accessed January 30, 2023).

**CONCLUSION**

For the above stated reasons, Mr. Nuhanovic respectfully requests that the Court sentence him to one year and a day followed by a period of supervised release.

This 2nd day of February, 2023.

/s/ Jess B. Johnson

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